

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

----- x

DAVIDSON CHUKWUKA,

Plaintiff,

- against -

**DEFENDANTS' NOTICE OF  
MOTION FOR SUMMARY  
JUDGMENT**

05 Civ. 4331 (MGC)

CITY OF NEW YORK, NEW YORK CITY HUMAN  
RESOURCES ADMINISTRATION, and RICHARD  
BECK, DIRECTOR OF BUREAU OF  
RECONCILIATION AND CONTROL, NEW YORK  
CITY HUMAN RESOURCES ADMINISTRATION  
FINANCE OFFICE and SHERRY BERKOWITZ,

Defendants.

----- x

**PLEASE TAKE NOTICE** that upon defendants' Rule 56.1 Statement in Support of their Motion for Summary Judgment, dated March 1, 2011, the Declaration of Isaac Klepfish, March 1, 2011 and the exhibits annexed thereto, and the Memorandum of Law in Support of Defendants' Motion for Summary Judgment and upon all prior pleadings and proceedings, defendants will move this Court on March 31, 2011 at 9:30 a.m. before the Honorable Miriam Goldman Cederbaum, United States District Judge for the Southern District of New York, in Courtroom 14A at the United States District Courthouse located at 500 Pearl Street, New York, New York pursuant to Rule 56 of the Federal Rules of Civil Procedure, granting summary judgment and dismissing the complaint against defendants in its entirety, together with such other and further relief the Court deems just and proper.

Pursuant to the Individual Practices of this Court, answering papers must be received by all parties by noon on Wednesday of the week before the return date, i.e., March 23,

2011. Reply papers, if any, must be received by all parties by noon on Tuesday of the week of the return date, i.e., March 29, 2011.

Dated: New York, New York  
March 1, 2011

MICHAEL A. CARDOZO  
Corporation Counsel of the  
City of New York  
Attorney for Defendants  
100 Church Street, Room 2-171  
New York, New York 10007  
(212) 788-0897

By: Isaac Klepfis  
ISAAC KLEPFISH  
Assistant Corporation Counsel  
iklepfis@law.nyc.gov

TO: NNEBE & ASSOCIATES, P.C.  
Attorney for Plaintiff  
472 Union Avenue, Suite 1000  
Brooklyn, New York 11211

05 Civ. 4331 (MGC)

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

DAVIDSON CHUKWUKA,

Pla

- against -

CITY OF NEW YORK, NEW YORK CITY  
HUMAN RESOURCES ADMINISTRATION, and  
RICHARD BECK, DIRECTOR OF BUREAU OF  
RECONCILIATION AND CONTROL, NEW  
YORK CITY HUMAN RESOURCES  
ADMINISTRATION FINANCE OFFICE and  
SHERRY BERKOWITZ,

Defendants.

**DEFENDANTS' NOTICE OF MOTION FOR  
SUMMARY JUDGMENT AND SUPPORTING  
PAPERS**

*MICHAEL A. CARDODOZO*

*Corporation Counsel of the City of New York*

*Attorney for Defendants  
100 Church Street  
New York, N.Y. 10007*

*Of Counsel: Isaac Klepfish  
Tel: (212) 788-0897  
NYCLIS No.*

*Due and timely service is hereby admitted.*

*New York, N.Y. ...., 200...*

*..... Esq.*

*Attorney for.....*